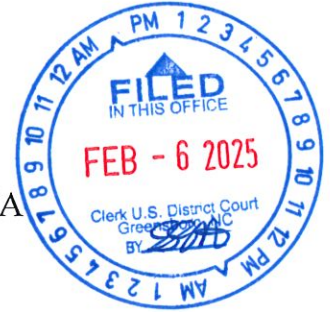


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA, : Civil No. 1:25MC 3  
Plaintiff, :  
 :  
v. :  
 :  
\$30,000.00 in U.S. Currency, :  
Defendant. :

**MOTION FOR EXTENSION OF TIME TO FILE  
VERIFIED COMPLAINT OF FORFEITURE**

The United States of America, by and through Randall S. Galyon, Acting United States Attorney for the Middle District of North Carolina, and pursuant to 18 U.S.C. § 983(a)(3)(A), hereby respectfully moves the Court to extend, by approximately 90 days, the time within which to file a civil forfeiture complaint against the above-named property, seized on May 28, 2024, to and including May 8, 2025. The United States requests additional time for further investigation of the basis for forfeiture, and evaluation of the administrative claim.

Consent to the requested extension was given by attorney J. Michelle Sawyer, on behalf of Shamari Taylor, the only claimant in the administrative proceedings.

WHEREFORE, the United States of America respectfully requests that the Court grant an extension of time to file a civil forfeiture Complaint against the above-named property to and including May 8, 2025.

A proposed Order is attached.

WHEREFORE, the United States of America respectfully requests that the Court grant an extension of time to file a civil forfeiture Complaint against the above-named property, from February 7, 2025, to and including May 8, 2025.

This the 6<sup>th</sup> day of February, 2025.

Respectfully submitted,

RANDALL S. GALYON  
Acting United States Attorney

/s/ Nathan L. Strup  
Nathan L. Strup, Mo. Bar No. 60287  
Assistant United States Attorney  
Middle District of North Carolina  
101 S. Edgeworth Street, 4th Floor  
Greensboro, NC 27401  
(336) 333-5351/nathan.strup@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2025, the foregoing document was filed with the Clerk of the Court, and I hereby certify that I have mailed the document to the following:

**Addressee:**

J. Michelle Sawyer  
5540 McNeely Drive, STE 301  
Raleigh, N.C. 27612  
*Attorney for Shamari Taylor*

/s/ Nathan L. Strup  
Nathan L. Strup  
Assistant United States Attorney